

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

JAMSHID NORIYAN (01)  
DEHSHID NOURIAN (02)  
CHRISTOPHER RYDBERG (03)  
MICHAEL TABA (07)

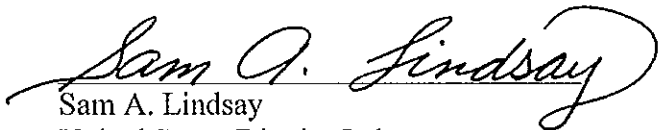
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Criminal Case 3:17-CR-155-L

**ORDER**

On August 28, 2023, 2022, the parties filed the attached Joint Notice of Agreed Admissible Exhibits (Doc. 612), which contains a list of all exhibits to which the parties agree are admissible for all purposes during the trial of this case. Accordingly, these trial exhibits are hereby **preadmitted** for all purposes, such that the parties need not obtain any further ruling before using these exhibits during the trial of this case.

It is so ordered this 11th day of September, 2023.

  
Sam A. Lindsay  
United States District Judge

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

JAMSHID NORYIAN (01)  
a.k.a. JAMES NORYIAN  
DEHSHID NOURIAN (02)  
a.k.a. DAVID NOURIAN  
CHRISTOPHER RYDBERG (03)  
MICHAEL TABA (07)

CRIMINAL NO. 3:17-cr-155-L

**JOINT NOTICE OF AGREED PREADMITTED EXHIBITS**

The United States of America, Jamshid Noryian, Dehshid Nourian, Christopher Rydberg, and Michael Taba (“the Parties”) jointly file this Notice of Agreed Preadmitted Exhibits pursuant to the Court’s July 21, 2023 Order. (*See* Dkt. 540.) No Party objects to the below exhibits. The Parties reserve the right to object at trial to any exhibits not listed below and listed on their respective objections filed with the Court.

**I. GOVERNMENT PREADMITTED EXHIBITS**

GX	DESCRIPTION
<b>100s - Secretary of State Records</b>	
101	Ability Secretary of State Filings
102	Industrial and Family Secretary of State Filings
103	Park Row Pharmacy Secretary of State Filings
104	Bandoola Secretary of State Filings
105	HJLM Holding LLC Secretary of State Filings
106	Queen Shiva LLC Secretary of State Filings
107	Ace Queen LLC Secretary of State Filings
108	Ace King LLC Secretary of State Filings
109	Michael Taba M.D. Secretary of State Filings
110	Magnum Surgical Products LLC Secretary of State Filings
111	Jade and Joy LLC Secretary of State Filings
112	Benson Injury Clinic P.A. Secretary of State Filings

GX	DESCRIPTION
<b>500s - Bank Records</b>	
502	Signature Card for Wells Fargo Account Ending in 6919
503	September 8, 2014 Check from Sherri Mofid to Michael Taba for \$10,000
504	August 14, 2014 Cashier's Check from Sherri Mofid to Michael Taba for \$100,000
505	September 8, 2014 Cashier's Check Sherrif Mofid to Michael Taba for \$90,000
514	Deposit Slip for \$100,000 to Chase Account Ending in 5614
515	Deposit Slip for \$90,000 to Chase Account Ending in 5614
516	Deposit Slip for \$10,000 to Chase Account Ending in 5614
517	Deposit Slip for \$150,000 to Chase Account Ending in 5614
518	Deposit Slip for \$70,000 to Chase Account Ending in 5614
519	Deposit Slip for \$136,600 to Chase Account Ending in 5614
520	Deposit Slip for \$258,000 to Chase Account Ending in 5614
521	Withdrawal Slip for \$750,000 from Chase Account Ending in 5614
522	November 11, 2015 Check from Michael Taba to Sherri Mofid for \$50,000 ending in 5614
535	Signature Card for Wells Fargo Account Ending in 8897
547	Ennis State Bank Account Ending in 7903 Held in the Name of Kevin Williams
548	Signature Card for Ennis State Bank Account Ending in 7903
549	Deposit Slip for \$214,000 to Ennis State Bank Account Ending in 7903
550	Deposit Slip for \$219,000 to Ennis State Bank Account Ending in 7903
551	Deposit Slip for \$309,000 to Ennis State Bank Account Ending in 7903
558	Signature Card for Wells Fargo Account Ending in 0302
562	Signature Card for JP Morgan Chase Account Ending in 9863
565	Signature Card for JP Morgan Chase Account Ending in 3462
573	Signature Card for Prosperity Bank Account Ending in 9542
578	JP Morgan Chase Signature Card for Account Ending in 2280
579	January 1-January 29, 2016 Statement for JP Morgan Chase Account Ending in 2280
580	May 1-May 29, 2015 Statement for JP Morgan Chase Account Ending in 2280
581	October 1-30, 2015 Statement for JP Morgan Chase Account Ending in 2280
582	October 31-November 30, 2015 Statement for JP Morgan Chase Account Ending in 2280
583	September 1-30, 2015 Statement for JP Morgan Chase Account Ending in 2280
585	Signature Card for Prosperity Bank Account Ending in 6341
586	Excerpt from April 30, 2015 Statement for Prosperity Bank Account Ending in 6341
589	Signature Card for Bank of America Account Ending in 5271
601	Signature Card for BancorpSouth Bank Ending in 5371
606	Signature Card for JP Morgan Chase Account Ending in 7273
<b>600s - Tax Records</b>	
626	Ability Pharmacy 2015 Form 1120S
627	Ability 2015 Transcript of Account
628	Ability 2016 Form 1120S
629	Second Ability Pharmacy 2016 Form 1120S
630	Ability 2016 Transcript of Account
632	Industrial & Family Pharmacy 2015 Form 1120S
633	Industrial & Family Pharmacy 2015 Transcript of Account
635	Industrial & Family Pharmacy 2016 Transcript of Account
636	2015 Industrial & Pharmacy - Signature Form - Form 8879-S

<b>GX</b>	<b>DESCRIPTION</b>
637	2016 Industrial & Family Pharmacy - Signature Form - Form 8879-S
640	Park Row 2015 Form 1120S
641	Park Row 2015 Transcript of Account
642	Park Row 2016 Form 1120S
643	Park Row 2016 Transcript of Account
645	2015 Park Row Pharmacy - Signature Form - Form 8879-S
646	2016 Park Row Pharmacy - Signature Form - Form 8879-S
651	Dehshid Nourian 2015 Transcript of Account
654	Dehshid Nourian 2016 Transcript of Account
656	2015 Dehshid Nourian - Signature Page - Form 8879
657	2016 Dehshid Nourian - Signature Page - Form 8879
658	Ali Khavaramanesh 2015 Form 1040
659	Ali Khavaramanesh 2015 Transcript of Account
661	Robert Ritter 2015 Form 1040
662	Robert Ritter 2015 Transcript of Account
664	Julie Ritter 2015 Form 1040
665	Julie Ritter 2015 Transcript of Account
667	Bandoola 2015 Form 1065
668	Bandoola 2015 Transcript of Account
669	Bandoola 2016 Form 1065
670	Bandoola 2016 Transcript of Account
671	HJLM 2015 Form 1065
672	HJLM 2015 Transcript of Account
673	HJLM 2016 Form 1065
674	HJLM 2016 Transcript of Account
675	Jade and Joy 2015 Form 1065
676	Jade and Joy 2015 Transcript of Account

## II. JAMSHID NORNYAN PREADMITTED EXHIBITS

<b>Ex.</b>	<b>Description</b>
1	Ability Pharmacy Board of Pharmacy Records
2	Industrial & Family Pharmacy Board of Pharmacy Records
3	Park Row Pharmacy Board of Pharmacy Records
10	Ability Pharmacy Secretary of State Records
11	Industrial & Family Pharmacy Secretary of State Records
12	Park Row Pharmacy Secretary of State Records
20	Ability Pharmacy Financial Records
21	Industrial & Family Pharmacy Financial Records
22	Park Row Pharmacy Financial Records
30	Ability Pharmacy 2015 Tax Records
31	Ability Pharmacy 2016 Tax Records
32	Industrial & Family Pharmacy 2015 Tax Records
33	Industrial & Family Pharmacy 2016 Tax Records

34	Park Row Pharmacy 2015 Tax Records
35	Park Row Pharmacy 2016 Tax Records
37	Bandoola Pharmaceutical 2015 Tax Records
38	Bandoola Pharmaceutical 2016 Tax Records
40	Ace Queen Secretary of State Records
41	Ace King Secretary of State Records
42	Bandoola Pharmaceuticals Secretary of State Records
43	HJLM Holding Secretary of State Records
44	Jade and Joy Holding Secretary of State Records
45	Queen Shiva Secretary of State Records
50	Ace Queen Financial Records
51	Bandoola Pharmaceutical Financial Records
52	HJLM Holding Secretary of State Records
53	Jade and Joy Holding Secretary of State Records
54	Queen Shiva Secretary of State Records
110	Michael Taba Promissory Note
111	Taba Loan Repayments
126	Taba Construction Repayments
130	Magnum Promissory Note
131	Magnum Promissory Note

**III. DEHSHID NOURIAN PREADMITTED EXHIBITS**

Ex. No.	Description
7	Certified Filing with Secretary of State for Ace King

**IV. CHRISTOPHER RYDBERG PREADMITTED EXHIBITS**

Ex. No.	Description
1	SOS - Bandoola Pharmaceutical LLC
2	SOS - Industrial & Family Pharmacy, Inc.
3	SOS - Ability Pharmacy, Inc
5	SOS - Jade and Joy Holding, LLC
6	SOS - HJLM Holding, LLC
7	SOS - Queen Shiva LLC
8	SOS - Park Row Pharmacy, LLC
9	Jade and Joy Holding LLC 1065 account transcript 2016
10	Rydberg MeF Form 1040 2015
11	Khavarianesh 1040 account transcript 2015
13	Rydberg 1040 account transcript 2015.
14	Ability Pharmacy Inc 1120S account transcript 2015
15	HJML Holding LLC 1065 account transcript 2016
16	Nourian 1040 account transcript 2015
17	Bandoola Pharmaceutical LLC 1065 account transcript 2016

Ex. No.	Description
18	Park Row Pharmacy LLC 1120S account transcript 2016
19	Khavarmansh MeF Form 1040 2015
20	Ritter J. 1040 account transcript 2015
21	Industrial & Family Pharmacy Inc 1120 account transcript 2015
22	HJLM Holdings LLC MeF Form 1065 2015
23	HJLM Holdings LLC MeF Form 1065 2016
24	Ritter J. MeF Form 1040 2015
25	Jade and Joy Holding LLC MeF Form 1065 2015
26	Ability Pharmacy Inc MeF Form 1120S 2015
27	Bandoola Pharmaceutical LLC MeF Form 1065 2015
28	Ability Pharmacy Inc MeF Form 1120S 2016
29	Jade and Joy Holding LLC 1065 account transcript 2015
30	Park Row Pharmacy LLC MeF Form 1120S 2016
31	Industrial & Family Pharmacy Inc MeF Form 1120S 2015
32	Park Row Pharmacy LLC 1120S account transcript 2015
33	Ritter R. MeF Form 1040 2015
34	Ritter R. 1040 account transcript 2015
35	HJLM Holding LLC 1065 account transcript 2015
36	Nourian 1040 account transcript 2016
37	Bandoola Pharmaceutical LLC 1065 account transcript 2015
38	Ability Pharmacy Inc 1120S account transcript 2016
39	Park Row Pharmacy LLC Form 1120S 2015
40	Bandoola Pharmaceutical LLC MeF Form 1065 2016
41	Jade and Joy Holding LLC MeF Form 1065 2016
84	Industrial Pharmacy - 2016 Signature Form 8879-S
85	Industrial Pharmacy - 2015 Signature Form 8879-S
86	Park Row Pharmacy - 2015 Signature Form 8879-S
87	Park Row Pharmacy - 2016 Signature Form 8879-S
89	Bandoola 1065 201612
90	Jade Joy 1065 2015
91	Jade Joy 1065 2016
92	HJLM 1065 201512
93	HJLM 1065 201612
249	Promissory Note
252	Promissory Notes

## V. MICHAEL TABA PREADMITTED EXHIBITS

None.

(continued on the next page)

Respectfully submitted,

LEIGHA SIMONTON  
UNITED STATES ATTORNEY

GLENN S. LEON  
CHIEF, FRAUD SECTION

/s/ Ethan Womble

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**CERTIFICATE OF CONFERENCE**

On August 28, 2023, I conferred with counsel for all parties in this matter who indicated they join in this notice.

/s/ *Ethan Womble*

ETHAN WOMBLE

Trial Attorney